

**Steve Largent**  
President/CEO

July 24, 2013

The Honorable Greg Walden  
Chairman  
Energy & Commerce Subcommittee on Communications & Technology  
2182 Rayburn House Office Building  
Washington, D.C. 20515

Dear Greg:

As the Energy and Commerce Committee prepares to mark-up the FCC Process Reform Act and the FCC Consolidated Reporting Act, I want to commend you for your ongoing commitment to enhancing the efficiency and predictability of the FCC's process.

Although CTIA does not get involved in matters related to license transfers, there are other elements of your bill, such as the requirement that the FCC publish the specific language of a proposed rule or the proposed amendment to an existing rule, the enhanced use of cost-benefit analysis, and the provision aimed at preventing "data dumps" immediately before an item goes on "sunshine," that would represent significant improvements in the regulatory process. We believe that a streamlined, more predictable regulatory process will enhance regulatory certainty and promote economic growth, innovation, competitiveness, and job creation, goals that the President specifically called out in his February 2011 Executive Order on Regulatory Reform.

I also want to support Congressman Scalise's FCC Consolidated Reporting Act. In today's converged landscape, it makes sense for the Commission to consider the entire communications ecosystem when evaluating whether the wireless industry – or any other industry segment – is subject to "effective competition." Today's consumers enjoy a wide array of choices when they buy telephony or broadband service and though the Commission has taken steps to reflect this in its reports, it is good policy to update the Communications Act to better reflect the realities of today's marketplace.

Additionally, by moving these reviews to a biennial schedule, the Scalise legislation will reduce the regulatory burden imposed on the industry, a goal CTIA supports since it will reduce the cost of complying with the FCC's not insubstantial requests for information. In this, CTIA agrees with the General Accountability Office's recent finding that "less frequent reporting ... could allow for continued measurement of industry performance while reducing the burden on the FCC and industry participants." While the GAO's finding was in the context of a study of competition in the video industry, its conclusion can easily be applied across all of the sectors that fall within the FCC's jurisdiction.

Thank you for your leadership on these issues. Sensible regulatory policies can contribute to the wireless industry's ability to continue serving as a catalyst for innovation, economic growth and job creation.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve".

Steve Largent  
President and CEO

Greg,  
you're doing a great  
job! Keep it up!